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To: Microsoft ATR
Date: 1/23/02 4:13pm
Subject: Microsoft Settlement

I am writing to express my concern with the proposed settlement terms in the Microsoft antitrust case. I have been involved in computer technical support and programming for a number of years now, mainly on computers running Windows operating systems.

One of my particular concerns is the fact that Microsoft will not be required to disclose key information about its widely-used Microsoft Office file formats and other proprietary file formats. These formats are so widely used in the US business and academic community that they form an important part of the Applications Barrier to Entry (see Findings of Fact 20 and 39). The process of building competing applications -- or even applications designed to interface seamlessly with Microsoft Office software! -- becomes very difficult if these common formats can not be supported, both for reading and writing.

In general there is no reason for these formats to be proprietary except for the express purpose of raising the Applications Barrier to Entry! A classic Word document, for example, is equivalent to a particular sequence of formatted characters; in many cases (in the absence of Word macros or other application-specific information) it can be mimicked exactly by a Rich Text Format document.

However, if Word crashes or there is a write error on a hard drive changing just a few bytes of a Word file, it is often very difficult to recover even a fraction of the original text and formatting -- which can mean a loss to the user of hours or days of work, even though the file is almost completely intact (only a few bytes altered). This problem is basically due to the fact that Word format is obfuscated -- it works correctly only when everything is exactly right.

This may not be a deliberate design decision on the part of Microsoft, but in general Word will not read a Word file correctly if there is anything "suspicious" about the format. This is exactly what is needed to raise the Applications Barrier to Entry, given that the file format is not published; it would be very difficult to write an application that could read and write Word format flawlessly, without access to Word file format information.

Similar arguments apply to requiring Microsoft to publish all relevant information about Windows API functions that developers might need, either to interface with the Windows operating system or to produce other operating systems that run software written for Windows. The Applications Barrier to Entry is unnecessarily raised by withholding this type of information. Making this information available must be part of any

appropriate settlement of the Microsoft case.

Thank you for your time and attention.

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